

IN THE CIRCUIT COURT OF THE COUNTY OF ST. LOUIS
STATE OF MISSOURI

IN RE THE MARRIAGE OF:)
)
SONNY S. SAGGAR,)
)
Petitioner/Counter-Respondent,)
and) Cause No.: 23SL-DR00394
) Division: 34
LAURA J. SAGGAR,)
)
Respondent/Counter-Petitioner,)
)
and)
)
EMERGENCY PHYSICIAN CONSULTANTS,)
INC., a Delaware Corporation,)
)
Third-Party Respondent.)

RESPONDENT'S FIRST AMENDED COUNTER-PETITION
FOR DISSOLUTION OF MARRIAGE

COMES NOW Respondent/Counter-Petitioner, Laura Saggar ("Mother"), and for her Counter-Petition for Dissolution of Marriage and states as follows:

1. Respondent/Counter-Petitioner, Laura Saggar ("Mother"), is a resident of St. Louis County, Missouri and resides at [REDACTED]. Mother has resided in St. Louis County for a period of approximately 22 years preceding the filing of this Petition and has resided in the State of Missouri for 44 years.

2. Petitioner/Counter-Respondent, Sonny Saggar ("Father"), is a resident of St. Louis County, Missouri and resides at [REDACTED]. Father has resided in St. Louis County for a period of 24 years preceding the filing of this Petition and has resided in the State of Missouri for 23 years.

3. Third-Party Respondent Emergency Physician Consultants, Inc., ("EPC") is a Delaware corporation that conducts business in the state of Missouri and that has title ownership of real property located in the state of Missouri.



4. Mother is employed and her [REDACTED] [REDACTED].
5. Father is employed and his [REDACTED] [REDACTED] [REDACTED].
6. Mother and Father were married on [REDACTED] [REDACTED], and the marriage of the parties is registered in [REDACTED] [REDACTED], [REDACTED].
7. Mother and Father physically separated in February of 2023.
8. Three unemancipated children were born of the marriage and who are subjects to this proceeding, namely: [REDACTED] [REDACTED], [REDACTED] [REDACTED] [REDACTED], [REDACTED] [REDACTED], [REDACTED] [REDACTED], [REDACTED] [REDACTED].
9. During the five years immediately preceding the filing of Mother's Counter-Petition, the children resided with the parties at [REDACTED] [REDACTED] [REDACTED]; and since February of 2023, with Mother at [REDACTED] [REDACTED] [REDACTED], [REDACTED], [REDACTED] [REDACTED] [REDACTED] and with Father at [REDACTED] [REDACTED] [REDACTED].
10. Mother has not participated in any other proceeding concerning the custody or visitation of the children.
11. Mother does not know of any other proceeding that could affect the current proceeding, including protective orders, termination of parental rights and adoptions of the children other than the cause referenced above.
12. Mother is not pregnant at the time of the filing of this Amended Counter-Petition.
13. Mother and Father have made no arrangements as to maintenance or the custody and support of the minor children.
14. There is no reasonable likelihood that the marriage of the parties can be preserved, and the marriage of the parties is irretrievably broken.
15. The parties possess separate and marital property and debts.
16. Neither Mother nor Father is a member of the Armed Forces of the United States of America on active duty.
17. It is in the best interest and welfare of the minor children that the Court grant and award joint legal custody and joint physical custody of the minor children to Mother and Father.

18. Mother is employed but she does not have adequate financial resources with which to maintain this proceeding or to support herself and the minor children, such that she requires maintenance, child support, attorney's fees, and litigation costs from Father.

19. Father is capable of contributing to the support of Mother and the minor children, and towards Mother's attorney's fees and litigation costs.

20. The president of Emergency Physician's Consultants Inc, ("EPC") is Monica Saggar, Father's sister.

21. Based upon Mother's belief and knowledge, EPC was created in anticipation of the institution of this dissolution action.

22. Without Mother's consent, or prior knowledge, Father transferred to EPC real property and business entities that are marital property.

23. Upon the filing her motion to join EPC as a party to this cause, Father was the SOLE signatory on bank accounts in the name of EPC, and funds being deposited into the account, and funds being paid out of the account were in his SOLE control.

24. Based on Mother's belief and knowledge Father remains in control of other assets he transferred to EPC.

25. The sale and transfer of marital assets to EPC was effected in fraud of the marital estate.

26. Based upon Mother's belief and knowledge, Father transferred ownership of these marital assets to EPC for the purpose of reducing the marital estate in anticipation of this dissolution of marriage action.

27. The real property and business entities that Father transferred to EPC are marital assets and subject to division by this Court.

WHEREFORE, Mother prays that this Court enter its order, judgment and decree, dissolving the marriage of the parties and making a finding that the marriage of the parties is irretrievably broken; granting joint legal custody and joint physical custody of the children to Mother and Father; ordering Father to pay Mother reasonable sums of money as and for

maintenance and child support, retroactive to the date of service; ordering Father to pay Mother a reasonable amount as and for her attorney's fees, litigation expenses and court costs of this action; setting apart to each party his and her separate property and dividing the marital property, including that property held by EPC, in a manner that this Court deems appropriate; dividing any and all marital debts between the parties; and, for whatever further and additional relief this Court deems just and proper under the facts and circumstances.

PAULE, CAMAZINE & BLUMENTHAL
A Professional Corporation

By: Lisa G. Moore

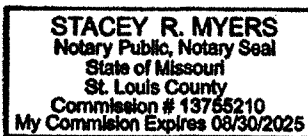
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Attorneys for Respondent

STATE OF MISSOURI)
) SS.
COUNTY OF ST. LOUIS)

The undersigned, being duly sworn upon her oath, deposes and states that the facts and matters stated in the foregoing Answer and Counter-Petition are true and correct according to her best information, knowledge and belief.

Laura Sagg
Laura Sagg, Respondent

Subscribed and sworn to before me this 28th day of July, 2023.



Stacey R Myers
Notary Public

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the attorney whose name appears above signed the original of this pleading and that a true and correct copy of this pleading was served by through the court's electronic filing system on the 28th day of July, 2023 on James P. Carmody, Attorney for Petitioner.

Stacy R Myers